



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME: JOANNA CONZONE**

**MOS TAX: [REDACTED]**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS CONZONE:  
REGARDING 2015-094372 (3000580987), Marihuana was identified without vegetative matter being listed as a descriptor on the report. The evidence consisted of vegetative matter; however, the description on the report was incorrect.

**Disclosure # 2:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS CONZONE:  
REGARDING 2016-076082 (1000839806)/ 2016-075640 (1000838756), The analyst received a submitted sample to perform quantitative analysis and did not notice that the notes of the analyst submitting the sample contained a pre-homogenized weight which was the same as the pre-analysis weight. The submitting analyst took a post-analysis weight of the solid material and the pure weight of cocaine in the sample was recalculated.

**Disclosure # 3:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS CONZONE:  
REGARDING 2016-105382 (2000600824), The original report was released with a typographical error, reporting the net weight of an item with the incorrect units of measurement. The report was amended.

**Disclosure # 4:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS CONZONE:  
The analyst obtained results that were inconsistent with the expected results. The analyst was issued a subsequent proficiency test (OP 19-22).

**Disclosure # 5:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS CONZONE:

REGARDING 2012-081791 (2000116824), The analyst prepared a sample incorrectly and submitted the report for review. After the issue was discovered by the reviewer, the sample was re-prepared and re-run.

Eric Gonzalez  
District Attorney  
Kings County